

201-14457



NCIC HPV

Sent by: Mary-Beth  
Weaver

05/13/2003 09:02 AM

To: NCIC HPV, moran.matthew@epa.gov

cc:

cc:

Subject: Merisol -- Ethylphenols Category



Barbara Christianson <BChristianson@lawbc.com> on 05/12/2003 04:51:59 PM

To: Christine Whitman/DC/USEPA/US@EPA  
cc: Richard Hefter/DC/USEPA/US@EPA, "Kenneth P. Morgan " <ken.morgan@merisol.com>,  
"oppt.ncic@epa.gov" <oppt.ncic@epamail.epa.gov>, Rtk Chem/DC/USEPA/US@EPA, "Lisa M.  
Campbell" <LCAMPBELL@lawbc.com>

Subject: Merisol -- Ethylphenols Category

Appended is Merisol's proposed category and test plan for the Ethylphenols Category as part of its commitment under EPA's HPV Challenge Program. Please let us know if you have any questions.

<<99LT008\_.doc>> <<RevisedEPMay\_.doc>>

Barbara Christianson

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03 MAY 13 AM 9:52



201-14457

MERISOL USA LLC  
1914 Haden Road  
Houston, Texas 770015  
(713) 428-5400 ☐ Fax (713) 455-0276

May 12, 2003

Via E-Mail and Regular Mail

The Honorable Christine Todd Whitman  
Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

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MAY 13 AM 9:52

Re: HPV Challenge Program Submission by Merisol --  
EPA Registration No:. \_\_\_\_\_

Dear Administrator Whitman:

On July 29, 2002, Merisol USA LLC (Merisol) submitted its proposed category approach and test plan for the Ethylphenols Category as part of its commitment under EPA's High Production Volume (HPV) Challenge Program. The Ethylphenols Category consists of the following three chemicals:

o-ethylphenol (CAS No. 90-00-6)  
p-ethylphenol (CAS No. 123-07-9)  
m-ethylphenol (CAS No. 620-1 7-7 )

Merisol received comments from EPA in a letter, dated December 20, 2002. Appended are the Ethylphenols test plan and robust summaries, which have been revised to incorporate the comments from EPA. The major changes that have been made to the appended document include:

- **Test Substance:** At EPA's request, Merisol has modified the test mixture to more closely resemble a Merisol product. The revised test plan indicates our intent to test a mixture containing portions of ethylphenol isomers normalized to match the ratios of ethylphenol isomers occurring in an actual commercial product containing the highest percentage of all three ethylphenols.
- **Robust Summaries:** Merisol has prepared additional robust summaries which are appended to the test plan.
- **Cresols:** The revised test plan includes a further explanation for Merisol's discussion of the cresols data to ensure it is clear that we are not relying on



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- **Cresols:** The revised test plan includes a further explanation for Merisol's discussion of the cresols data to ensure it is clear that we are not relying on the cresols data for conclusions about ethylphenols with regard to HPV testing requirements.
- **Testing Proposal:** Merisol has modified its testing proposal, as recommended by EPA, with regard to physicochemical properties, biodegradation, photodegradation, hydrolysis, fugacity, ecological effects, and acute and genetic toxicity testing.
- **Environmental Toxicity and Fate:** Merisol has added an environmental toxicity and fate section to discuss environmental toxicity, biodegradation, and photolysis.
- **Corrections:** Merisol has corrected values for boiling points, melting points, octanol/water partition coefficient, and vapor pressure.

As discussed previously with EPA, Merisol intends to conduct the ethylphenols testing following its testing program for its mixed xylenols category, so that the testing results from mixed xylenols can inform Merisol as to its proposed testing program for the ethylphenols. Testing for the mixed xylenols likely will be completed in 2005; testing for ethylphenols then would begin at that time.

This submission is also being sent electronically to the following e-mail addresses:

[oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov)

[chem.rtk@epa.gov](mailto:chem.rtk@epa.gov)

Thank you for your assistance in this matter. If EPA requires any additional information, please contact Lisa Campbell at (202) 557-3802 or [lcampbell@lawbc.com](mailto:lcampbell@lawbc.com).



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May 12, 2003  
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Sincerely,

Kenneth P. Morgan  
Manager Technical Support Services  
Merisol USA LLC

Attachment

cc: Mr. Richard H. Hefter, Jr. (w/attachment) (via e-mail)